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**PACIFIC**  **TELESIS**  
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**EX PARTE OR LATE FILED**

November 7, 1994

**EX PARTE**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

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**NOV 7 1994**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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Dear Mr. Caton:

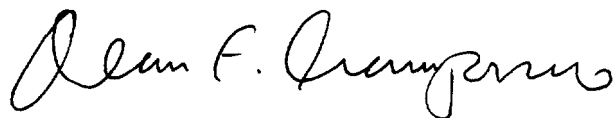
Re: CC Docket No. 92-237, North American Numbering Plan  
IAD File No. 94-102, Request for Declaratory Ruling and Interlocutory Order on  
Numbering Plan Area Code Relief Plan (Ameritech)

On November 4, Nancy Woolf and Andrea Cooper of Pacific Bell and I met with Kathleen Levitz, John Morabito, Richard Welch, Peyton Wynn, and Jim Casserly of the Commission to discuss the above-referenced dockets and the issues set forth in the attached document which was used during the presentations. Please associate this material with these proceedings.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

cc: Kathleen Levitz  
John Morabito  
Richard Welch  
Peyton Wynn  
Jim Casserly

No. of Copies rec'd 022  
List A B C D E

# Dialing Issues

Pacific Bell

November 4, 1994

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# Nationwide Uniform Dialing Not Needed

- ◆ Dialing proposals: “1” as toll indicator or 10 digit dialing for all calls
  - No benefit to users
  - Goal of dialing plan is to complete calls
- ◆ Inconveniences customers
  - Requires more digits to be dialed than necessary

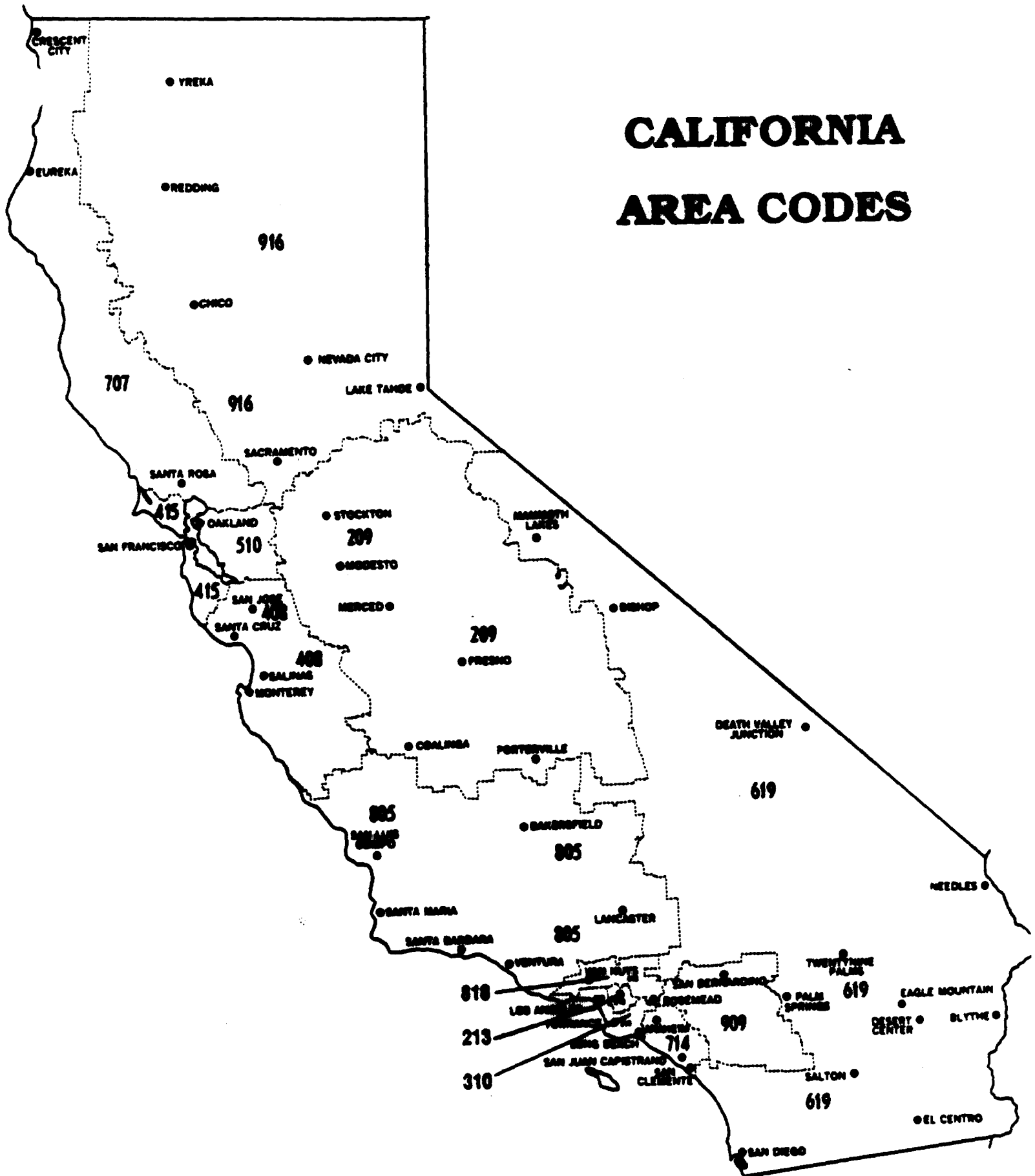
# California Dialing Plan

- ◆ Started in 1970's -- conforms to NANP
  - Requires minimum number of digits dialed to complete call
    - ❖ Dial "1" only before foreign NPA
    - ❖ All calls within home NPA are 7 digits
  - Customer confusion minimized
- ◆ Statewide Uniform Dialing in effect December 1994

# Defer to State Jurisdiction Over Dialing

- ◆ No national need for uniformity
- ◆ State can and should assess local dialing requirements

# CALIFORNIA AREA CODES



# Split vs. Overlay Comparison

	<b>562 Split</b>	<b>562 Overlay</b>	<b>Future Overlay</b>
<b>New Area Code</b>	Yes	Yes	Yes
<b>Educate customers about 1+ 10 dialing to new area code</b>	Yes	Yes	Yes
<b>Change existing telephone numbers - cellular and landline</b>	Yes (2.3 million)	No*	No
<b>Lag between wireless and wireline use of new area code</b>	No	1 year (but no forced use of 562 before contemporaneous use)	No

\* We have no plans to change any telephone numbers. If forecasts given by code holders are inaccurate, some number changes may be necessary.

# 310 Area Code Relief

- ◆ No distinction between wireless and wireline carriers
  - Distinction based on interconnection point because:
    - ❖ technical limitations in support systems at end office
    - ❖ ease of implementation at tandem
- ◆ Lag for first overlay only



# Wireless Growth Has Fueled the Exhaust

(1994 Statistics)

- ◆ Wireless market growth in 310 is 64%
- ◆ Wireline market growth in 310 is 3%
  - Second line residential, faxing, etc, is not driving number exhaust.
  - Wireline usage is in line with forecasts
- ◆ 80% of all 310 NXX code openings driven by wireless demand

# Dialing Disparity Not Anticompetitive

- ◆ LA residents dial 1+ 10 digits for many “local” calls
- ◆ Currently there are 5 area codes in greater LA
- ◆ Customer education on change in dialing is part of any area code relief -- split or overlay

# Principles for Overlay Implementation

- ◆ Don't foreclose implementation based on point of interconnection where technical reasons exist for distinction
- ◆ Provide technical alternatives such as:
  - adjacent area code assignment
  - change point of interconnection
- ◆ Simultaneous introduction after 1996 (no lag between tandem and end office)
- ◆ No burdensome dialing changes